

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

MARY LOU PETT, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

PUBLISHERS CLEARING HOUSE, INC.,

Defendant.

Civil Action No. 2:22-CV-11389-DPH-EAS

**STIPULATION FOR INITIAL  
EXTENSION OF TIME TO ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S CLASS ACTION  
COMPLAINT**

Complaint Filed: June 22, 2022

Complaint Served: June 30, 2022

Plaintiff Mary Lou Pett ("Plaintiff") and Defendant Publishers Clearing House, Inc. ("PCH" and, together with Plaintiff, the "Parties") hereby file this stipulation seeking an order from the Court extending PCH's deadline to respond to Plaintiff's Class Action Complaint by 29 days to August 19, 2022 ("Stipulation"). Good cause exists to grant this Stipulation based on the following facts:

1. On June 22, 2022, Plaintiff filed in the United States District Court for the Eastern District of Michigan a class action complaint against PCH, alleging that PCH violated Michigan's Preservation of Personal Privacy Act ("Complaint"). [Dkt. No. 1.]

2. Pursuant to Rule 12(a)(1) of the Federal Rules of Civil Procedure, PCH's current responsive pleading deadline is July 21, 2022.

3. Since Plaintiff filed her Complaint, PCH has been investigating Plaintiff's cause of action and her allegations in support of same, and the Parties have been meeting and conferring on the results of that investigation.

4. The Parties are still meeting and conferring on Plaintiff's allegations and PCH's investigation into same, and the Parties believe that the additional time requested herein will

further allow the Parties to explore Plaintiff's claims without engaging in costly and, potentially, unnecessary motions practice.

5. Therefore, the Parties respectfully request that the Court grant this Stipulation and continue PCH's responsive pleading deadline by 29 days to Friday, August 19, 2022.

**IT IS SO STIPULATED.**

Dated: July 21, 2022

Respectfully submitted,

By: s/ Frank S. Hedin

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DATED: July 21, 2022

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Attorneys for Defendant

PUBLISHERS CLEARING HOUSE, INC.

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 21, 2022, I electronically filed the foregoing

**STIPULATION FOR INITIAL EXTENSION OF TIME TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S CLASS ACTION COMPLAINT** using the CM/ECF system,  
which will send notification of such filing to all counsel of record.

/s/ Matthew D. Pearson